

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s Ben C. Martin

Ben C. Martin
The Law Offices of Ben C. Martin
3219 McKinney Avenue
Suite 100
Dallas, TX 75204
(214) 761-6614
bmartin@bencmartin.com
Counsel for Plaintiffs

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

<i>Civil Action No.</i>	<i>Case Name</i>
2:13-cv-06031	Darby C. Rhodes; G. Roger Rhodes vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-09649	Dyana Sailors; Wesley Sailors vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-15463	Linda Rodriguez; Arturo Rodriguez vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-22812	Andrea Gouviea; Alvaro Gouviea vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-17318	Bernadette Pepa, et al v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-21870	Christy Konnick; Michael Konnick, Jr. vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-19297	Debra Barker; James Barker vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-08285	Margaret Hayden; Joseph Daniel Hayden vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-23982	Michele Thorpe, et al v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-10305	Michelle Olsen v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-22449	Naomi Bigelow vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-25202	Patricia Turner, et al v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-26750	Sharon Everett, et al v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-25021	Susan Blum; Wayne Blum vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-23983	Tonya MacNicol, et al v. Ethicon, Inc.; Johnson & Johnson